

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS MAYES  
(UPS/USPS-T37-75)

The United States Postal Service hereby provides the response to the following interrogatory of United Parcel Service: UPS/USPS-T37-75, filed on September 17, 1997, and redirected from witness Mayes.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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October 1, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO UPS INTERROGATORIES  
REDIRECTED FROM WITNESS MAYES

UPS/USPS-T37-75. Please refer to page 1, lines 14-15 of your direct testimony, where you state that the current rate structure of Parcel Post is based, in part, on whether "the parcel is mailed and delivered within a bulk mail center (BMC) or auxiliary service facility (ASF) service area."

- (a) Please confirm that for rate purposes, an ASF and a BMC are treated identically. If not confirmed, please explain.
- (b) Are ASF and BMC service territories mutually exclusive? If not, please explain.
- (c) Describe generally where there are ASF service areas.
- (d) What dictates whether there is an applicable ASF or BMC service territory? Please explain your answer.

Response:

(a) Confirmed.

(b) For purposes of claiming the DBMC discount, ASF and BMC service territories are mutually exclusive. Please refer to the DMM at L602. If the DBMC discount is not being claimed, the ASF service territories are subsets of their parent BMCs' service territories. Please refer to the DMM at L601.

(c) Please refer to L601 and L602 in the DMM. The following BMCs have ASFs in their service areas:

Pittsburgh BMC	Buffalo ASF
Des Moines BMC	Sioux Falls ASF
Minneapolis/St. Paul BMC	Fargo ASF
Dallas BMC	Oklahoma City ASF
Denver BMC	Albuquerque ASF
	Billings ASF
	Salt Lake City ASF
	Phoenix ASF

(d) The applicable service territory would depend on whether the mail is claiming a DBMC discount. ASFs generally process Parcel Post originating and

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destinating within their service areas. Other Parcel Post would be processed at the parent BMC.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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